

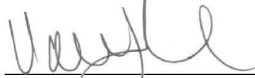
**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE AMAZON.COM, INC. EBOOK
ANTITRUST LITIGATION

Case No. 1:21-cv-00351-GHW-VF

JOINT STATUS REPORT

MEMO ENDORSED



HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE
DATED: 9-13-2024

The parties are directed to file a joint
status update on **Tuesday,**
November 12, 2024.

The parties jointly provide the following report on their progress in discovery. *See* ECF 258. The parties can provide the following updates:

1. Discovery

The parties are working through discovery as discussed below. Over the next month, Plaintiffs intend to work with Amazon's counsel to develop a realistic and agreeable discovery schedule proposal for the Court that would allow the parties adequate time to address currently open items. Amazon was only recently made aware of Plaintiffs' intention to request an adjustment to the discovery schedule, and does not presently believe that an adjustment is necessary. But Amazon will listen to Plaintiffs' proposals in good faith, and formulate a response when it has more information.

Plaintiffs have been reviewing and cataloging Amazon's production of approximately 62,000 documents. Amazon began its production of those documents on June 12, 2024, substantially completed the production on July 17, 2024, and produced additional documents on September 6, 2024. As the parties agreed, Amazon's production consisted of documents that Amazon previously produced to the Connecticut Attorney General (the "Connecticut AG Production"), and Plaintiffs held off on making further discovery requests until they assessed whether the Connecticut AG Production was adequate for Plaintiffs' consumer class action. Based on their review of the production, Plaintiffs have sent Amazon additional requests for discovery on issues relating to class certification and other relevant matters and await Amazon's responses later this month.

Plaintiffs and their experts also have been working with Amazon's transactional data, which Plaintiffs received on July 26, 2024. Plaintiffs have asked Amazon's counsel questions about the data in an effort to resolve any technical data questions informally.

In addition, Plaintiffs have served subpoenas on the Publishers who were previously defendants in this case. Amazon has indicated that it too intends to subpoena documents from the Publishers. Beyond the Publishers, Plaintiffs expect to serve subpoenas on additional third parties in short order.

Given the above, the parties will confer in good faith and update the Court as appropriate.

Respectfully submitted September 12, 2024.

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